

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:21-cv-00814-CCE-LRW

LARISSA HARPER HAIRGROVE,)
Plaintiff,)
v.) **MOTION FOR SUMMARY JUDGMENT**
CITY OF SALISBURY, DOWNTOWN) **BY DEFENDANT LANE BAILEY IN HIS**
SALISBURY INC., and LANE BAILEY, in) **INDIVIDUAL CAPACITY**
his individual and official capacity,)
Defendants.)

COMES NOW Defendant Lane Bailey, in his individual capacity, and respectfully moves the Court for summary judgment as to all of Plaintiff's claims which have brought against him in his individual capacity in this matter. As shown herein, there is no genuine issue of material fact and he is entitled to judgment as a matter of law.

Specifically, Defendant's motion is based upon and supported by the pleadings, deposition transcripts, documents and other discovery in this matter. Defendant is also entitled to summary judgment for the reasons more specifically provided in the Memorandum of Law in support of Defendants' Motion for Summary Judgment filed contemporaneously herewith.

WHEREFORE, Defendant Lane Bailey, in his individual capacity, respectfully requests that this Court grant his motion for summary judgment as to all plaintiff's claims and that all claims against this Defendant in his individual capacity be dismissed with prejudice.

This the 3rd day of April, 2023.

CRANFILL SUMNER LLP

By:/s/ Patrick H. Flanagan

Patrick H. Flanagan, NC Bar #17407
Stephanie H. Webster, NC Bar #12164
Attorneys for Defendants
Post Office Box 30787
Charlotte, NC 28230
Telephone (704)332-8300
Facsimile (704) 332-9994
phf@cshlaw.com
swebster@cshlaw.com

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day electronically filed the foregoing
**MOTION FOR SUMMARY JUDGMENT BY DEFENDANT LANE BAILEY IN HIS
INDIVIDUAL CAPACITY** with the Clerk of Court using the CM/ECF system and served the
same on all of the parties to this cause addressed as follows:

Valerie L. Bateman June K. Allison valerie@newsouthlawfirm.com june@newsouthlawfirm.com <i>Attorneys for Plaintiff</i>	G. Bryan Adams, III Bryan.adams@vraplaw.com <i>Attorney for Defendant Downtown Salisbury, Inc.</i>
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This the 3rd day of April, 2023.

CRANFILL SUMNER LLP

BY: /s/Stephanie H. Webster
Stephanie H. Webster
State Bar # 12164
Attorney for Defendants
Post Office Box 30787
Charlotte, North Carolina 28230
Telephone: (704) 332-8300
Facsimile: (704) 332-9994
swebster@cshlaw.com